

Permit and Compliance Issues

Carol Staniec, John McGuire and
Ken Guenter - WECA

Flow Measurements

- Have you considered :
 - Line Flushing
 - Equipment Washdowns
 - Stormwater
 - Sludge dewatering

Flow Measurements

- Have you considered :
 - Laboratory Flows
 - wastewater from incoming samples
 - wastewater from process sampling
 - effluent samples

Flow Measurements

- truck washouts
- Secondary containment pump outs

Flow Measurements

- estimated or measured
- last time calibrated
- EPA encourages mass water balances

Sampling Locations

- Does it include all discharges?
- Is it adjusted for local limits?
- Is it upstream from a CSO point?
 - should incorporate some control mechanism about discharge

Additional Permit Requirements

- Test each load -variable loads
- Waste acceptance procedures as permit condition
- Notification of off- specifications waste
 - Could require CWT to submit waste loads that they turned away
- Cleaning of lateral and main sewer lines
- Testing of prohibitive parameters

Verifications

- Cross checking waste receipts from other IUs
- Down stream sampling
- Surveillance

Modified Test Methods

- Plain Language guide
- Letter to Laboratory
- Evaluation of modified 625 and 1625 data